

Congressman Patrick L. Meehan
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November 19, 2014

<u>Via email:</u> kcollins@fec.gov Attn: Kim Collins, Paralegal Federal Election <u>Commission</u> Office of Complaints, Examination and Legal Administration 999 E Street, NW Washington, DC 20436

RE: MUR-6899: RESPONSE TO COMPLAINT

Dear Ms. Collins:

I am the Treasurer of the Pat Meehan for Congress Committee (the "Committee") and I submit this Statement under Oath as the response of the Committee and me, in my capacity as the Committee's Treasurer, to the complaint of Mary Ellen Balchunis for Congress ("Balchunis") referenced by MUR-6899 (the "Complaint").

The allegations in the Complaint have no merit whatsoever. The Committee had no connection or involvement in any manner with respect to the mailing referenced by the Complaint (the "Mailing"). Upon receiving the Complaint, we contacted the Republican Federal Committee of Pennsylvania ("RFCP") and the RFCP advised us that the Mailing satisfied the regulatory requirements necessary to qualify for the volunteer materials exemption under 2 U.S.C. §431(8)(B)(ix) and (9)(B)(viii), 11 C.F.R. §§100.87 and 100.147. Furthermore, the RFCP advised us that it used federal funds to pay for the Mailing, thus satisfying 11 C.F.R. §§100.87(a),(b) and 100.147(a)(b).

The Mailing does not require an "authorized statement" because it qualifies for the volunteer materials exemption. 11C.F. R. §110.11(e).

The Complaint does not even make any allegations regarding the source of the funds for the Mailing or any evidence that the Mailing does not meet the requirements of the volunteer materials exemption. As such, the Complaint has not offered any facts to support its claim. The allegations that the Committee authorized the Mailing are completely baseless and no evidence has been offered by Balchunis to support its accusation.

We understand that the RFCP is submitting a Response to the Complaint that will validate and support that the Mailing qualifies for the volunteer materials exemption. The Mailing was not authorized by the Candidate or Committee.

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Paid for by Pat Meehan for Congress



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The allegations against the Committee in the Complaint are completely without merit and have been filed and submitted by Balchunis with a reckless disregard for the facts and without any minimum level of investigation or due diligence. Therefore, we request that the Complaint be dismissed in its entirety.

Very truly yours,

Lovis Schiazza, Treasurer

Pat Meehan for Congress Committee

Notary Public

NÖTARIÄL SEAL KERRI CIMINERA Notary Public MEDIA BOROUGH, DELAWARE COUNTY My Commission Expires Mar 18, 2015